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7 *Attorneys for Defendants*
 8 James Dzurenda and Michael Minev

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 GREGORY BOLIN,

12 Plaintiff,

13 v.

14 DR. KOHN, *et al.*,

15 Defendants.

Case No. 3:23-cv-00168-MMD-CLB

**ORDER GRANTING JOINT
 STIPULATION FOR
 EXTENSION OF TIME TO FILE
 RESPONSE TO MOTION FOR
 PRELIMINARY INJUNCTION
 (ECF No. 58)**

16 Plaintiff, Gregory Bolin, by and through counsel, Julie D. Cantor, J. Cantor Law,
 17 and Paula M. Armeni, Clark Hill, PLC and Defendants James Dzurenda and Michael
 18 Minev, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R.
 19 Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney
 20 General, hereby submit this *Joint Stipulation for Extension of Time to file Response to*
 21 *Preliminary Injunction*.

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 **I. BACKGROUND AND RELEVANT PROCEDURAL HISTORY**

24 Mr. Bolin filed this case alleging violations of his constitutional rights.(ECF No. 5)
 25 Defendants have accepted service.(ECF No. 13) On or about March 25, 2024, this Court
 26 issued a Scheduling Order and Discovery Plan.(ECF No. 29) Mr. Bolin filed a Motion for
 27 Preliminary Injunction on June 2, 2025. (ECF No. 58) The response is due on June 16,
 28 2025. Counsel for the Defendants is scheduled to begin a jury trial on June 17, 2025 in

1 Federal District Court in Reno. Due to trial preparation it will be difficult to craft a proper
2 response by the deadline. Therefore, the Parties request additional time for the response.

3 **II. APPLICABLE LAW FOR MOTION TO STAY DISCOVERY**

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
5 follows:

6 When an act may or must be done within a specified time, the
7 court may, for good cause, extend the time: (A) with or without
8 motion or notice if the court acts, or if a request is made, before
9 the original time or its extension expires; or (B) on motion made
10 after the time has expired if the party failed to act because of
11 excusable neglect.

12 Defendant's request is timely and will not hinder or prejudice Mr. Bolin's case but will
13 allow for a thorough opportunity to respond to the motion. The requested extension of
14 time should permit the Defendant time to adequately gather the required exhibits and
15 prepare the response. Defendant asserts that the requisite good cause is present to
16 warrant the requested extension of time. Counsel has a trial that begins on June 17,
17 2025 and requires the remaining time to prepare for the trial. This is the first extension
18 request on this response and is made in good faith.

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1 **III. CONCLUSION**

2 Defendants assert that the requisite good cause and extenuating circumstances are
3 present to warrant the requested extension of time. Therefore, Defendants requests an
4 extension to file their response to Plaintiff's Motion for Preliminary Injunction. The Parties
5 request an extension of 25 days, or to **Friday, July 11, 2025**, to file the Defendants'
6 response.

7 DATED this 13th day of June, 2025.

7 DATED this 13th day of June, 2025.

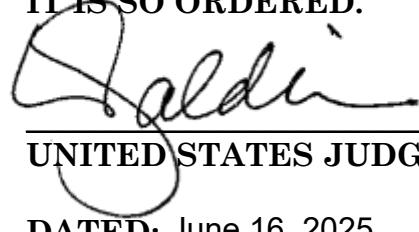
8 J. CANTOR LAW
9 CLARK HILL PLLC

8 AARON D. FORD
9 Attorney General

10 By: /s/ Julie D. Cantor, MD, JD
11 Julie D. Cantor MD, JD
12 Paola M. Armeni, Esq.
13 *Attorneys for Plaintiff*

10 By: /s/ Douglas R. Rands
11 DOUGLAS R. RANDS, Bar No. 3572
12 Senior Deputy Attorney
13 *Attorneys for Defendants*

14 IT IS SO ORDERED.



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18 UNITED STATES JUDGE
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17 DATED: June 16, 2025
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